

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

JOON BANG, RAZVAN VICTOR
BENGULESCU, GERALD BEZEMS,
SCOTT CROCKETT, RIFAT
GORENER, CHRISTOPHER LESIEUR,
LAWRENCE MARCUS, and MIKHAIL
SULEYMANOV, individually and on
behalf of others similarly situated,

Plaintiffs,

vs.

BMW OF NORTH AMERICA, LLC,
BAVARIAN MOTOR WORKS, and
DOES 1 through 10, inclusive,

Defendants.

No. 2:15-cv-6945 (MCA)(LDW)

CLASS ACTION

**DECLARATION OF MATTHEW D. SCHELKOPF IN SUPPORT OF
PLAINTIFFS' UNOPPOSED MOTION FOR PRELIMINARY APPROVAL
OF CLASS ACTION SETTLEMENT**

I, Matthew D. Schelkopf, declare as follows:

1. I am a member of the law firm of McCune Wright Arevalo, LLP, and proposed Settlement Class Counsel for Plaintiffs in the above-captioned action. I am admitted to practice before the Supreme Courts of Pennsylvania and New Jersey. I submit this Declaration in Support of Plaintiffs' Motion for Preliminary Approval of the Class Action Settlement.

2. Attached hereto as **Exhibit 1** is a true and correct copy of the Settlement Agreement in this Action.
3. Attached hereto as **Exhibit 1-A** is true and correct copy of the Claim Form.
4. Attached hereto as **Exhibit 1-B** is a true and correct copy of the Notice.
5. Attached hereto as **Exhibit 1-C** is a true and correct copy of the proposed Preliminary Approval Order.
6. Attached hereto as **Exhibit 2** is a true and correct copy of the firm resume of proposed Settlement Class Counsel McCune Wright Arevalo, LLP.
7. Attached hereto as **Exhibit 3** is a true and correct copy of the firm resume of proposed Settlement Class Counsel Wagstaff & Cartmell LLP.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: May 4, 2018

Respectfully submitted,

By: /s/ Matthew D. Schelkopf
Matthew D. Schelkopf
Joseph B. Kenney
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CERTIFICATE OF SERVICE

I, Matthew D. Schelkopf, certify that I caused the foregoing to be electronically filed in this case on May 4, 2018, using the Court's CM/ECF System, thereby serving it upon all counsel of record in this case.

/s/ Matthew D. Schelkopf
Matthew D. Schelkopf